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7 8		The Honorable RICARDO S. MARTINEZ
9	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE	
10	BACKPAGE.COM, LLC,	NO. 2:12-cv-00954-RSM
11 12	Plaintiff, v.	DECLARATION OF PAULA SELIS IN OPPOSITION TO PLAINTIFF'S MOTION FOR
13 14	ROBERT M. MCKENNA, Attorney General of Washington State, et al,	TEMPORARY RESTRAINING ORDER
15	Defendants.	
16	I, Paula Selis, declare:	
17	1. I am an Assistant Attorney General with the State of Washington's Attorney	
18	General's Office Consumer Protection Division. I am over the age of eighteen and qualified	
19	to make this Declaration.	
20	2. On June 30, 2011, I met with rep	presentatives of Backpage.com at the Office of
21	the Attorney General to discuss the company's	s escort advertising. The meeting was held at
22	the request of Backpage.com. Backpage.com's representatives at the meeting were	
23	Carl Ferrer, Vice President of Sales and Marketing for the company; Don Bennett Moon, an	
24	attorney and member of Board of Directors for Village Voice Media, Backpage.com's parent	
25	company; and Kenneth Stocker, Publisher of the Seattle Weekly, a Village Voice Media	
26	publication. The Attorney General's Office wa	s represented at the meeting by Chris Johnson,

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the Attorney General's Office Policy Director; Dan Sytman, Deputy Communications Director for the Attorney General's Office, and me.

3. Backpage.com told us their purpose in asking for the meeting was to demonstrate their efforts to police their website for underage human trafficking. After discussing their efforts, Dan Sytman asked whether there were any illegal ads on the Backpage.com website. They responded that there were no ads that offered sex for money. I took them to task for this and said "You mean to tell me that if someone responded to an advertisement, the woman they called for services would be offering to go out for coffee? That's what you are advertising?" At that point, Don Moon looked at Carl Ferrer and said "Don't deny the undeniable" and laughed. It was clear that Mr. Moon meant it was undeniable that the ads on Backpage.com were for prostitution services, and they should not pretend otherwise. After Mr. Moon made this statement, he followed up by saying that the First Amendment gave Backpage.com the right to advertise in the manner they have chosen. This confirmed to me that he understood the true nature of the advertising, but believed Backpage.com had a right to distribute it nonetheless.

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4. During the conversation, I also asked whether Backpage.com had proactively
called the people who advertise on their website to determine what, exactly, they were
offering for sale. My question was not answered. Rather, the Backpage.com representatives
turned the discussion to the Communications Decency Act and Mr. Moon's claim that it
absolutely protected Backpage.com from liability.

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this day of June, 2012, at Seattle, Washington.

ROBERT M. MCKENNA Attorney General

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